

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS**

**JONETTA BROOKS,**

**Plaintiff,**

**v.**

**MEDICREDIT, INC.,**

**Defendant.**

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**Civil Action No.: 3:16-cv-01938-M**

**PLAINTIFF'S MOTION TO VOLUNTARY DISMISS HER COMPLAINT**  
**PURSUANT TO F.R.C.P. 41(a)(2)**

Plaintiff, Jonetta Brooks ("Plaintiff"), through her counsel, Kimmel & Silverman, P.C., brings this motion requesting the court voluntarily dismiss her Complaint with prejudice, each side to bear its own costs, pursuant to F.R.C.P. 41(a)(2). Plaintiff has conferred with Defendant and Defendant does not consent to this request.

For the reasons set forth in the accompanying Memorandum of Law, Plaintiff wishes to dismiss this case with prejudice and requests that the Court grant her request.

RESPECTFULLY SUBMITTED,

DATED: January 20, 2017

KIMMEL & SILVERMAN, P.C.

/s/ Amy Lynn Bennecoff Ginsburg  
Amy Lynn Bennecoff Ginsburg, Esq.  
Bar No. 202745PA  
30 E. Butler Avenue  
Ambler, PA 19002  
Tel: 215-540-8888  
Fax: 215-540-8817  
Email: aginsburg@creditlaw.com  
Attorney for the Plaintiff

**CERTIFICATE OF SERVICE**

I certify that on January 20, 2017, I filed the foregoing document with the clerk of the U.S. District Court, Northern District of Texas via ECF, which will effect service on all counsel of record.

DATED: January 20, 2017

KIMMEL & SILVERMAN, P.C.

/s/ Amy Lynn Bennecoff Ginsburg  
Amy Lynn Bennecoff Ginsburg, Esq.  
Bar No. 202745PA  
30 E. Butler Avenue  
Ambler, PA 19002  
Tel: 215-540-8888  
Fax: 215-540-8817  
Email: aginsburg@creditlaw.com  
Attorney for the Plaintiff